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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	No. 3:19-cr-00112-TMB-MMS
)	
Plaintiff,)	<u>COUNT 1:</u>
)	DRUG CONSPIRACY
vs.)	Vio. of 21 U.S.C. §§ 846 and 841(a)(1),
)	(b)(1)(A)
JORDAN JEROME SHANHOLTZER,)	
a/k/a "Two-3," a/k/a "23;" MATTHEW)	<u>ENHANCED STATUTORY</u>
WILSON MOI, a/k/a "Matt Matt;")	<u>PENALTIES ALLEGATION</u>
KENNETH ANTONIO KIAIRE FORD,)	21 U.S.C. § 841(b)
a/k/a "Keyes;" MYRICK ANTHONI)	
ELLIOTT; and ISAIAH MICHAEL)	<u>CRIMINAL FORFEITURE</u>
RODERICK, a/k/a "Izzy,")	<u>ALLEGATION:</u>
)	21 U.S.C. § 853 and Fed. R. Crim. P.
)	32.2(a)
Defendants.)	
)	

INDICTMENT

The Grand Jury charges that:

COUNT 1

Between on or about September 25, 2019, and on or about October 2, 2019, within the District of Alaska and elsewhere, the defendants, JORDAN JEROME SHANHOLTZER, a/k/a "Two-3," a/k/a "23;" MATTHEW WILSON MOI, a/k/a "Matt Matt;" KENNETH ANTONIO KIAIRE FORD, a/k/a "Keyes;" MYRICK ANTHONI ELLIOTT; and ISAAH MICHAEL RODERICK, a/k/a "Izzy;" knowingly and intentionally combined, conspired, confederated and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to distribute and to possess with intent to distribute a controlled substance, to wit: one kilogram or more of a mixture and substance containing a detectable amount of heroin.

All of which is in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A).

ENHANCED STATUTORY PENALTIES ALLEGATION

At the time JORDAN JEROME SHANHOLTZER, a/k/a "Two-3," a/k/a "23," committed the offense charged in Count 1, he had a conviction that had become final for a serious violent felony, Assault in the Third Degree in case 3AN-07-00461CR, and a conviction that had become final for a serious drug felony, Distribution of Controlled Substances in case 3:07-cr-00090-JWS, and for each conviction he served more than 12 months of imprisonment and his release from any term of imprisonment related to each offense was within 15 years of the commencement of the offense charged in Count 1.

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CRIMINAL FORFEITURE ALLEGATION

Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. § 846, as charged in Count 1 of this Indictment, the defendants, JORDAN SHANHOLTZER, a/k/a "Two-3," a/k/a "23;" MATTHEW WILSON MOI, a/k/a "Matt Matt;" KENNETH ANTONIO KIAIRE FORD, a/k/a "Keyes;" MYRICK ANTHONI ELLIOTT; and ISAAH MICHAEL RODERICK, a/k/a "Izzy;" shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

If any of the property described above as a result of any act or omission of any of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

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All pursuant to 21 U.S.C. § 853 and Fed. R. Crim. P. 32.2(a).

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Kelly Cavanaugh
KELLY CAVANAUGH
Assistant U.S. Attorney
United States of America

s/ Bryan Schroder
BRYAN SCHRODER
United States Attorney
United States of America

DATE: October 15, 2019